

CORRECTED VERSION

April 6, 2011

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42; *Federal State Joint Board on Universal Service*, CC Docket No. 96-45; *Lifeline and Link Up*, WC Docket No. 03-109

Dear Ms. Dortch:

On April 5, 2011, Mary Henze, Cathy Carpino, Mike Tan, and Beth Fujimoto of AT&T, Chris Miller and Alan Buzacott of Verizon, Mitchell F. Brecher (Greenberg Traurig on behalf of TracFone), Norina Moy, Elaine Divelbliss and Grace Boehm of Sprint Nextel, David Cohen of US Telecom, Scott Bergmann of CTIA – The Wireless Association® and I, on behalf of General Communication Inc. (collectively “Industry Attendees”), participated on a conference call with the following FCC staff: Zachary Katz, Sharon Gillett, Austin Schlick, Carol Matthey, Dana Schaffer, Tom Buckley and Kim Scardino.

During the discussion, the various Industry Attendees stated that they were preparing a proposal to submit in the record that, if adopted, would create an interim process to eliminate simultaneous Lifeline subscriptions from multiple ETCs to the same individual, as well as to permit USAC to obtain further data with respect to instances in which multiple individuals at the same postal address may be receiving Lifeline services.¹ This filing also would identify certain rule changes necessary to implement the proposal. Industry Attendees also made the point that ETCs that provided Lifeline benefits to consumers in good faith and in the absence of a USAC mechanism to identify and resolve instances in which a single individual has multiple Lifeline subscriptions at or near the time service was initiated should not be subject to disgorgement or administrative offset of such amounts.

¹ This list is meant to summarize the points that were made by the various Industry Attendees collectively, and does not reflect that each Industry Attendee made or agreed with each point listed.

The Industry Attendees have authorized me to file this ex parte letter on their behalf, in fulfillment of the obligations of all Industry Attendees pursuant to 47 C.F.R. § 1.1206.

Sincerely,

A handwritten signature in black ink, appearing to read "John T. Nakahata".

John T. Nakahata
Counsel to General Communication, Inc.

cc:

Zachary Katz
Sharon Gillett
Austin Schlick
Carol Matthey
Dana Schaffer
Suzanne Tetreault

Tom Buckley
Terry Cavanaugh
Kim Scardino
Margaret McCarthy
Christine Kurth
Angela Kronenberg
Brad Gillen